

# **Town of Enfield Limited English Proficiency Plan**

Town of Enfield  
Human Resources Department  
820 Enfield Street  
Enfield, CT 06082

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Limited English Proficiency Manager  
Human Resource Director  
860-253-6346

**Individuals are to be informed of the availability of free interpreter and translation services when it appears that the individual is not able to communicate effectively in English.**

Use poster to determine what language they speak or Call directly to Language Line Services at 1-866-874-3972

## **LEGAL BASIS AND PURPOSE**

The following document serves as the plan for the Town of Enfield to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR 273 et seq.; and 42 CFR 435 et seq.

This document also serves as a model to show the Town of Enfield's commitment to provide meaningful access to all individuals accessing any of Enfield's public services. At all times, non-English speaking clients will be guaranteed service from the Town of Enfield for all public services which from hereon will be identified as the Town.

A notice to Limited English Proficiency (LEP) Plan will be posted in all buildings specifically the Social Service Department and the Community Development Department. LEP individuals are to be informed of the availability of free interpreter and translation services when it appears that the individual is not able to communicate effectively in English. Such services will be provided during all normal business hours and when an emergency has been determined to exist during non-business hours. Notice of availability of free interpreter services will also occur on the front page of this document in appropriate languages so individuals can understand the posted policy.

At no time will any Town employee or contractor indicate – either verbally or in writing – that any LEP applicant or client accessing Town services will be charged for interpreter or translation services.

Dissemination of the Limited English Proficiency Plan is to occur via many routes. Any individual will be able to access the plan via the Internet. All Town employees will have access to it via the Town Intranet/Internet and through meetings and training sessions. Area Legal Aid offices, contractors with the Town, and community partners will have access to the plan via the Internet. LEP individuals can obtain copies/translations upon request.

Further questions regarding this plan and its implementation may be directed to:

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## **BACKGROUND**

The Town of Enfield has reviewed the 2000 census to determine the predominate languages spoken in the community other than English. To this end the Town has developed this Limited English Proficiency Plan to assist citizens and to meet our obligations under Title VI of the Civil Rights Act of 1964 and as required due to Department of Transportation Funding.

## **LANGUAGE ASSISTANCE RESOURCES OFFERED**

### **Limited English Proficiency Populations to Be Served**

Through the use of a census data and information from the Town School System, the Town has identified the following language groups who may require interpretation services: Spanish, Arabic, Chinese, Hmong, Polish, and Vietnamese

## **PROCEDURE TO ACCESS LANGUAGE ASSISTANCE**

### **Means of Providing Interpretive Services**

The Town of Enfield has very few bilingual staff at this time. Being a small community of employees the staff knows which employees are bilingual and will request their assistance if the employee is available. Since this is not a reliable method the town will rely on contracted interpreters at Language Line Services – 1-866-874-3972 (The town's client code is 527235)

1. If the client has been offered free interpretive services and chooses to utilize his/her own interpreter – i.e., friend, family member or community member then a note will be made in the record of such choice. Staff should not require, suggest, or encourage a LEP client to use family members or friends as interpreters – however clients may wish to use family members and friends and this should be allowed. At no time will friends, family members or children under the age of 16 years old be utilized to provide interpretive services.

When confronted with a situation in which the client is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the LEP individual in the completion of necessary forms and documents. Preferably, an on-site interpreter will be used. However, if that is not possible, an interpreter from the contracted agency of Language Line Services (1-866-874-3972-The town's client code is 527235) will be utilized.

2. When individuals require access to services within short time frames, Town personnel – in consultation with the Human Resource Director – will take whatever steps deemed necessary to ensure that all clients, including LEP clients, have access to services within the appropriate time frame. The Towns' goal is to make its services accessible within the required time frame, whether that means using an interpreter or another appropriate type of language assistance.

Town departments should also utilize translated forms to assist in applicant/client/patient interaction and communication if available. Translated forms should be developed if it is

determined that there will be a continuing need. Case records will continue to be updated to reflect the client's preference for translated materials. Employees of the Town will be responsible for providing available translated forms at appropriate times. A new client will be asked his/her preference for translated forms prior to being given English-only forms. If the LEP individual is unable to read his/her own language in order to complete necessary forms, the above procedures will ensure that the LEP individual will be provided a competent interpreter through the process.

### **Rules for Contracted Interpreters**

All interpreting agencies contracted with Town are required to demonstrate that the interpreters they employ receive training in the ethics and competency standards of interpreting. In addition, agencies are required to ensure that their interpreters have been tested on their language proficiency.

Service providers who are contracted with Town as business associates are encouraged to buy interpreter services from competent contracted interpreter vendors.

### **Scheduling Interpreter Services**

Due to the fact that each department has the best information on the individual LEP populations accessing or in need of its services, a universal plan to coordinate interpreter services cannot be established. Departments will, however, follow the existing protocol for securing interpreter services. When a LEP client/patient requests Town services and no bilingual staff are available to provide language assistance, then staff will contact an interpreting vendor who has been contracted with the Town to provide services or use Language Line Services at 1-866-874-3972 (The town's client code is 527235)

### **Document Translation**

The Town will also continue to work with other state and federal agencies to identify the availability of translated documents. The Town will continue to develop translated documents as the need arises. Copies of all translated documents will be made available upon request.

### **Signage**

The Limited English Proficiency Plan will be posted at entry points of all buildings.

### **Privacy Issues**

Some of the departments use walled cubicle spaces to conduct client and/or customer interviews in a private and confidential manner. Other departments have private "intake" rooms where interviews are conducted on a one-to-one basis. Conference calls with clients are usually conducted in meeting rooms, although sometimes this is not the case. The Town will continue to determine appropriate space for client and/or customer interviews to provide privacy and interpretation services

## **CONSISTENCY IN THE DELIVERY OF SERVICES**

### **Procedures for Documentation**

The Town Staff will follow procedures and document cases when they used interpretation services to ensure a consistent and efficient delivery of services to individuals in the LEP population. **All LEP individuals will be informed of their right to free interpreter services or translated documents by the Town. The staff member will then document this offer and keep it with the client's records.**

### **Responsibility of Documentation**

The responsibility of documentation lies with the Town staff member working closely with the client and/or customer. However, all staff members working as first points of contact should understand the need to determine language needs of members of LEP populations in a timely manner. This will reduce delay, frustration, costs, and possible liability issues.

Training will ensure that staff working across Town departments will document the needs of members of LEP populations in a consistent and uniform manner.

Standardization of the methods regarding the offer for free interpretive services, the option to let someone else provide interpretation services will alleviate the confusion and delay when working with members of LEP populations.

### **Offers to All or Some Groups of Limited English Proficiency Populations**

Using the procedures outlined in the Limited English Proficiency Plan, Town staff will offer free interpreter services for *all* members of all LEP populations who do not speak or understand English. Some clients may misrepresent their ability to speak and/or understand English, but in order to protect the client, staff, and Town, interpreter services must be offered. It is important to note that a number of countries were colonized by Great Britain, and for this reason, their citizens speak English; however, due to regional differences, dialects, and accents, the English spoken by these clients might not be readily understandable by staff. In some cases, these clients might speak a patois or a Creole which is a language peppered with English words, but technically not a language all by itself and is *not* English. Such a client will be provided an interpreter as long as the staff member and/or the client feels that the presence of one will help facilitate the transaction.

### **Use of Family and Friends as Interpreters**

All employees will continue to be trained to be aware that staff should never require, suggest, or encourage a client with Limited English Proficiency to use family members or friends as interpreters. However, the Limited English Proficiency Plan has determined that it is acceptable to use family or friends only when expressly requested by the applicant or client or in an emergency. This action should be considered as a last resort, as the family member or friend may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, and may not be familiar with specialized program terminology.

## **TRAINING**

### **Existing Staff**

Existing Staff will be notified of the new Limited English Proficiency Plan and its rules and procedures through their supervisors, division heads or department heads.

### **Training of New Staff**

The Town Human Resources Department will provide a Limited English Proficiency Plan to all new employees as part of their orientation session.

### **Contracted Vendors**

All Town contracted vendors who work with Town citizens or customers will receive a written copy of the Town's Limited English Proficiency Plan. Language to ensure compliance with this plan will be written into new contracts. Contracts already in effect may be re-negotiated in order to add Limited English Proficiency compliance language. Vendors will be responsible to provide training for their employees, unless the Town agrees otherwise.

## **EVALUATION OF LEP**

On an as needed basis, the Limited English Proficiency Manager/Human Resource Director will coordinate with department management to review the Limited English Proficiency Plan for effectiveness, both on a departmental basis and a Town wide basis.